
CHAPTER III

CULTURAL RESOURCES PLANNING

Introduction

In accordance with Section 2.4.f of Department of the Army Pamphlet (DA PAM) 200-4, this chapter provides a brief review of applicable cultural resource management laws; discusses the general types of actions that affect cultural resources, with particular reference to their applicability to planned undertakings at Fort Belvoir; and examines the installation's current cultural resource management program. Succeeding chapters will provide general procedural guidelines and management goals for enhancing Fort Belvoir's existing program of cultural resource management.

Information for this chapter was gathered from interviews with key personnel at Fort Belvoir's Directorate of Installation Support (DIS) and the Humphreys Engineer Center; review of existing operating procedures; and an examination of the installation's master plan and available project files. DIS personnel were interviewed on a range of issues, including operating procedures, project tracking, proposed projects, facility maintenance, environmental compliance, and cultural resources management policies and procedures. Analysis of these data was used to develop the installation-specific procedures and recommendations presented in Chapters IV and V.

Statutory Framework

Federal legislation provides the statutory basis for identifying, evaluating, and protecting historic properties (i.e., those properties eligible for listing or listed on the National Register of Historic Places) managed by Federal agencies and delineates Federal agency responsibilities during the planning and review stages of federal actions. These laws and their implementing regulations define DoD responsibilities towards the protection of cultural resources within the specific installation mission, while ensuring that the interests of the nation, including recognized Indian tribes, are served in identifying and protecting cultural resources located on public lands.

National Historic Preservation Act (NHPA). The National Historic Preservation Act (NHPA) of 1966, as amended, is the cornerstone of Federal cultural resources management (CRM) law. It establishes a national program of historic preservation, and requires Federal agencies to administer historic properties in a spirit of stewardship and consider those properties when planning their activities. In addition, NHPA established a National Register of Historic Places (National Register), that lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture:

- instituted a system of State Historic Preservation Offices (SHPOs) for all states and territories to administer each state's historic preservation program [Section 101(b)(1)];

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- authorized the Secretary of the Interior to expand and maintain the National Register of Historic Places and establish procedures for nominating properties to the National Register;
 - directed the Secretary of the Interior to approve state preservation programs that were directed by a SHPO and a historic preservation review board;
 - established a National Historic Preservation Fund;
 - authorized a grant program to states for historic preservation activities and to individuals for the preservation of National Register properties;
 - established the Advisory Council on Historic Preservation (ACHP) as an independent agency to advise the President, Congress, and other federal agencies on historic preservation matters; to disseminate information on historic preservation; and to encourage public interest in historic preservation;
 - established the Section 106 review process, which requires that cultural resources are properly considered in the planning stage of any federal agency activity; and
 - incorporated the key features of Executive Order 11593 into Section 110 of the NHPA.¹

Sections 106 and 110 are the two primary elements of the NHPA related to Federal management of historic properties. Section 110 requires each Federal agency to establish a program to locate, inventory, and nominate and protect historic properties owned or controlled by the agency that may qualify for inclusion in the National Register. The intent of Section 110 is to identify the historic properties that should be considered when a Federal agency makes planning decisions.

Section 106 requires Federal agencies to "take into account" the effects of their "undertakings" on properties included in or eligible for inclusion on the National Register of Historic Places (36 CFR 800.1). In its regulations for the Section 106 process, the Advisory Council defined an undertaking as "any project, activity, or program that can result in changes in the character or use of historic properties." Federal undertakings include all direct actions; Federally-assisted actions such as those involving Federal funding or loan guarantees; and Federally-licensed activities, such as those requiring permits from Federal agencies (36 CFR 800.2). New regulations governing compliance with Section 106 of NHPA were revised by the Advisory Council on Historic Preservation and published in the Federal Register in the Spring of 1999; the revised regulations are summarized in Standard Operating Procedure 1 (Chapter IV) of this document.

The Federal agency responsible for the proposed undertaking (the "lead Federal agency") must initiate and complete the Section 106 review process. The first step is to identify known and potential cultural resources, and evaluate their potential eligibility applying the National Register Criteria for Evaluation (36 CFR 60.4 [a-d]). The potential effects of the proposed undertaking on significant identified resources, both direct and indirect, then are determined. If a proposed project is found to impact a National Register listed or eligible resource, steps then must be taken to mitigate anticipated damage to the resource. These decisions are made on a case-by-case basis. The State Historic Preservation Office (SHPO) and the Advisory Council for Historic Preservation (ACHP)

may serve as active participants in the Section 106 review process; the ACHP must be afforded a reasonable time to comment on a proposed project that will effect significant historic properties.

Section 106 review ensures that Federal agencies consider their historic properties early during the planning of proposed undertakings, along with other factors like environmental concerns, cost, design, and agency mission. However, preservation of every historic property is not the goal of Section 106, nor can the SHPO or ACHP veto any project absolutely.

National Environmental Policy Act of 1969 (NEPA). NEPA requires Federal agencies to consider the environmental effects of their proposed actions prior to initiation. Although NEPA compliance documents must contain an assessment of the impacts of a proposed action or activity on both natural and cultural resources, compliance with NEPA cannot itself substitute for Section 106 consultation. However, data and findings obtained through compliance with other cultural resources statutes and regulations (i.e., Section 106) may be integrated into the concurrent NEPA compliance process and documents. Army policy for compliance with NEPA is contained in AR 200-2; additional guidance on the NEPA compliance process is presented in Chapter IV, under *Procedure 5: National Environmental Policy Act (NEPA) Compliance*.

Archeological and Historic Preservation Act of 1974. This law requires Federal agencies to arrange for the recovery or protection of archeological data that could be damaged by Federally-funded or -licensed construction projects, and authorizes the use of project funds to implement such preservation activities.

Archeological Resource Protection Act of 1979 (ARPA). ARPA imposes Federal felony penalties for persons convicted of excavating, removing, damaging, or otherwise defacing archeological resources located on Federal lands, or selling, purchasing, or transferring artifacts obtained in violation of the law. ARPA requires that permits be issued prior to the initiation of archeological investigation on Federal property or on property under Federal control. DoD Policy Regulation 32 CFR 229 implements the provisions of ARPA and applies those provisions specifically to all properties under DoD jurisdiction. *Procedure 4: Archeological Resource Protection Act (ARPA) Compliance* (Chapter IV) provides additional information on the ARPA compliance process.

National American Graves Protection and Repatriation Act of 1990 (NAGPRA). This law, governs the repatriation and protection of Native American (American Indian, Inuit, and Hawaiian Native) remains, associated and unassociated funerary objects, sacred objects, and objects of "cultural patrimony" recovered from lands controlled or owned by the United States or held in the collections of federal agencies or federally funded museums. An object of cultural patrimony is defined as "an object having ongoing historical, traditional, or cultural importance central to the Native American group or culture." The law provides for the protection and return of cultural items to the descendants of the groups that produced them. *Procedure 6: Native American Graves Protection and Repatriation Act (NAGPRA) Compliance* (Chapter IV) outlines additional information on the NAGPRA compliance process.

Architectural Barriers Act of 1968 (42 USC 4151)/Rehabilitation Act of 1973 (29 USC 792). These laws and their implementing regulation (36 CFR 1190) are intended "to ensure that certain buildings and facilities financed with Federal funds are designed, constructed, or altered so as to be readily accessible to, and usable by, physically handicapped persons." However, the regulation exempts certain "Buildings and facilities not covered," including "any building or facility on a military installation designed and constructed primarily for use by able-bodied military personnel." The Uniform Federal Accessibility Standards generated by these regulations were

adopted by DoD in Chapter 18 of DoD Directive 4270.1-M “Construction Criteria.” With regard to altering historic properties for the purpose of providing access, the standards specify that, prior to undertaking any alterations, consultation with the Advisory Council for Historic Preservation is required. If the ACHP determines that the proposed alterations would threaten or destroy the historic significance or integrity of the property, then special minimum standards can be substituted.²

Regulatory Framework

Army Regulation 200-4/AR PAM 200-4. Army Regulation 200-4, *Cultural Resources Management*, delineates the Army's policy for managing cultural resources to meet legal compliance requirements and to support the military mission.³ AR 200-4 applies to all installations and activities under the Department of the Army's control, and supercedes AR 420-40, Historic Preservation (May 1984). Department of the Army Pamphlet (DA PAM) 200-4 establishes a comprehensive cultural resources planning and management strategy for the Army, and provides information on the preparation of ICRMPs. The primary purpose of AR 200-4 is to implement policy, assign responsibilities, and prescribe procedures for the integrated management of cultural resources on all DA properties. The scope of this regulation includes the NHPA, AIRFA, NAGPRA, ARPA, Executive Order (EO) 13007, 36CFR79, and other legislation and regulations affecting cultural resources management. These policies help to ensure that Army installations make informed decisions regarding the cultural resources under their control.⁴

Department of the Army Administrative Structure. The Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health) (DASA[ESOH]) is the Army's Federal Preservation Officer (FPO) and has primary responsibility for overseeing the Army's activities under the NHPA. The Assistant Chief of Staff for Installation Management (ACSIM) is the Army Staff proponent for the military Cultural Resources Management Program. The Director of Environmental Programs (DEP) is responsible for: (1) promulgating cultural resources policy and guidance; (2) identifying, supporting, and defending cultural resources requirements; and (3) directing and coordinating Army Staff cultural resources management program. The Commander, U.S. Army Environmental Center (AEC), under the direction of the DEP, provides a broad range of technical support and oversight services to facilitate the Army's Cultural Resources Management Program. The AEC supports Headquarters, Department of the Army (HQDA), Major Army command (MACOM), and installation cultural resources compliance activities and programs.⁵

Establishing an Installation Cultural Resources Management Program. AR 200-4 requires installation commanders to institute an installation cultural resources management program, following guidelines set forth in DA PAM 200-4. Installation commanders must:

- identify, protect, curate, and interpret the Army's cultural resources through a comprehensive program that complies with legally mandated requirements and results in sound and responsible cultural resources stewardship;
- establish, where appropriate, a government-to-government relationship with Federally-recognized tribal governments and other Native American organizations in accordance with federal laws and regulations;

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- establish an early coordination process between the CRM and installation staff, directorates, tenant organizations, and other interested parties prior to planning and implementing undertakings that may affect cultural resources;
 - where required, prepare and implement an installation-wide Programmatic Agreement (PA) and/or a Comprehensive Agreement (CA) to streamline compliance with NHPA and NAGPRA for ongoing mission and operations;
 - ensure that cultural resources management is integrated with installation training and testing activities, master planning (AR 210-20), environmental impact analysis (AR 200-2), natural resources and endangered species management planning (AR 200-3), and the Integrated Training Area Management (ITAM) program.
 - establish funding priorities and program funds for cultural resources compliance and management activities;
 - conduct a comprehensive evaluation of the installation's cultural resources management program; and
 - prepare, maintain, and implement ICRMPs, cultural resources inventory plans and schedules, PAs and MOAs, CAs and Plans of Action, and other documents, as appropriate.⁵

Designation of a Cultural Resource Manager (CRM). AR 200-4 also requires installation commanders to designate an installation "Cultural Resource Manager" (CRM), following the guidelines set forth in DA PAM 200-4. The CRM is directly responsible for managing the installation's cultural resources, in compliance with Federal legislation and AR 200-4, by:

- ensuring compliance with laws and regulations that affect cultural resources;
 - implementing procedures that ensure that all actions affecting cultural resources receive appropriate internal and external reviews;
 - coordinating external consultation, as needed, with the appropriate State Historic Preservation Officer (SHPO) under Section 106 of NHPA, and other regulatory agencies;
 - maintaining an up-to-date cultural resources inventory through continued identification and evaluation efforts;
 - providing guidance in internal planning and maintenance decisions that affect cultural resources;
 - providing technical consultation during internal review of projects affecting cultural resources;
 - implementing and revising the ICRMP;
 - coordinating cultural resource training for appropriate personnel; and,
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- answering general inquiries about the installation's cultural resources management program.

To accomplish these tasks, the CRM oversees coordination with civilian and military personnel in tenant organizations, other directorates, and other divisions and branches.

Actions Affecting Cultural Resources

Fort Belvoir's extensive land area encompasses many diverse natural features and built resources. The Post's development potential is affected by certain limitations, including land constraints (i.e., environmental, natural, and cultural resource concerns), infrastructure constraints, and transportation considerations. Built constraints that may affect future land use include airfield clear zone and runway protection, explosive safety zones, and archeological and historic sites. Cultural resource considerations constitute one constraint on the development of military posts like Fort Belvoir. Thus, future development potential is based on evaluating constraints and identifying areas where development is best suited.⁷

An "undertaking" is any Federal, Federally-funded, or Federally licensed activity that has the potential to change the character of an historic property. The term encompasses a broad range of activities like demolition, construction, repair, maintenance, training activities, and permitting. In general, when Fort Belvoir carries out an undertaking that may affect historic properties, the installation must conduct a review and consultation under Section 106 of NHPA. Table 7 describes general types of "undertakings," such as building demolition, new construction, building maintenance and repair, rehabilitation, and ground disturbance, and how these actions can affect historic properties. Table 8 contains a list of proposed projects at Fort Belvoir through the year 2004, and provides a preliminary assessment of the effects of these projects on historic resources.

Building Demolition. Demolition of an historic structure is an adverse effect to the resource. Demolition of structures also may adversely affect sub-surface archeological features and deposits when obsolete utility lines or underground storage tanks are removed, and heavy machinery traffic crosses historic building sites. Building demolitions currently contemplated for Fort Belvoir include, the removal of extant housing units in Lewis Heights, area T-400, and on Rossel Loop.⁸

New Construction. New construction generally includes extensive sub-surface disturbance and landscape modification; as a result, such projects may adversely affect unidentified archeological resources. New construction also can affect surrounding historic built resources. For example, construction of a new building may introduce visual, audible, or atmospheric elements that are out of character with the property or that alter its historic setting. Additions that are incompatible with the scale, massing, and/or overall visual appearance of an historic building also may result in an adverse effect. Because the potential for such adverse effects may extend to historic properties outside of installation boundaries, it may be necessary to include such properties within the Area of Potential Effect (APE) of a specific undertaking.

As indicated in Table 8, numerous new construction projects are planned or are in progress at Fort Belvoir. They include major development within the Tompkins Basin recreation area; a new Army Reserve Center; police and fire stations; a chapel; classroom facilities; and housing improvements. Proposed housing projects include both renovation of existing housing units and new construction at a variety of sites. Other projects currently under consideration include

Table 7: Typical Undertakings and Their Potential Effects on Cultural Resources

Undertaking (Type)	Potential Effect: Architectural	Potential Effect: Archeological
Building Demolition	Demolition of an historic structure is, by definition, an <i>adverse effect</i>	Building demolition may adversely affect subsurface archeological features and deposits through related actions as utility line removal and heavy machinery traffic.
New Construction	New construction may introduce architectural, visual, audible or atmospheric elements that are out of character with adjacent or surrounding historic properties.	Any undertaking involving subsurface disturbance constitutes an adverse impact on potential archeological resources. New construction generally involves site grading and excavation to accommodate the building and ancillary utilities, adjacent parking areas, and the like
Building Maintenance/Repair	Maintenance and minor repair work on interiors generally will have <i>no adverse effect</i> . Repairs to exteriors of historic buildings generally will have no adverse effects if the Secretary of Interior's <i>Standards for Rehabilitation</i> and other design guidelines are followed.	Grounds maintenance that involves sub-surface disturbance may affect archeological resources
Rehabilitation/Major Repair	Rehabilitation and/or major repairs will have <i>an effect</i> on historic buildings; however, that effect generally is not adverse if the <i>Standards for Rehabilitation</i> are followed.	Excavation or other activity in connection with building rehabilitation may affect archeological resources if it that involves sub-surface disturbance.
Ground Disturbance/IRP Cleanup	May adversely affect historic landscapes.	Excavation or other activity involving sub-surface disturbance may affect archeological resources. Examples of potentially harmful undertakings include: utility line replacement or construction; fuel tank or other removal of environmental contaminants; parking lot construction; building construction.
Training Activities	May adversely affect historic landscapes	Depending on nature of activity, may impact archeological resources. Examples of potentially harmful effects include: disturbance of sub-surface deposits by explosives detonation or test trenching; compaction of soils due to heavy pedestrian or mechanized transport traffic.

Table 8. Construction Projects for Fort Belvoir through FY 2004

FY	Project Title	Funding	Project Status	Project Description	Potential Cultural Resource Impact
99	Community Club Improvement (Building 1200)	NAF	Complete	Renovation to existing building	Check for potential adverse visual impact on historic district
00	North Post Golf Maintenance Facility (Buildings 2990, 2991, 2993)	NAF	Awarded for construction	Renovate existing buildings	No impact
00	Military Police Station	MILCON	Site selected; in design	New construction (North Post)	No impact
00	Davison Air Field Fire Station	MILCON	Site selected; in design	New construction (North Post)	No impact
00	South Post Golf Clubhouse	NAF	Under construction	New construction of replacement building	Check for potential adverse visual impact on historic district
00	Bowling Center Improvement (Building 1199)	NAF	In design	Interior renovation of existing building	No impact; existing building; not on historic inventory
01	Dogue Creek Village, Phase III	MILCON	Phase I/II ongoing	Renovate existing family housing	No impact; existing buildings not on historic inventory
02	T-400 Area Family Housing Replacement	MILCON	Planning	Demolish existing family housing; replace with new	SECTION 106 ACTION Historic buildings (ca. 1921 housing units) Potential Adverse Effect
01	North Post Golf Clubhouse Addition (Building 2920)	NAF	Planning	Enlarge existing building	No impact
02	Defense Threat Reduction Agency	MILCON?	Site selected; in design	New construction in DLA area of North Post Add 1300 personnel	No impact

FY	Project Title	Funding	Project Status	Project Description	Potential Cultural Resource Impact
04	North Post Chapel	MILCON?	Site selected	New construction on Woodlawn Road	SECTION 106 ACTION Potential visual impact on 2 National Register listed and eligible sites (Woodlawn Plantation; Woodlawn Friends' Meetinghouse)
04	Southwest Area Development	MILCON	Proposed only	New construction for PERSCOM; OPTEC; AMC; possibly DIA and others); administrative space for 4,200+ workers	SECTION 106 ACTION Direct impacts: Archeological sites in proposed development area; evaluate and mitigate, if needed Indirect impacts: Archeological sites in contiguous areas: potential for site damage through erosion, siltation and other adverse impact National Register historic properties adjacent: adverse visual impact on 1918 Water Filtration Plant (Building 1400); Gunston Hall; Pohick Church
ND	Tompkins Basin Recreation Area	Unknown	Site selected	New construction may include: RV campground Playing fields Lodge and cabins	SECTION 106 ACTION Direct impacts: Check for potentially eligible archeological sites in area Indirect impacts Potential visual and audio impacts on Gunston Hall viewshed; increased waterborne traffic may impose adverse impact on Maryland Potomac shoreline resources (e.g., Marshall Hall, Chapman's)

construction of a headquarters building for DTRA, and utilization of the Southwest Area to provide tenant space for a variety of major DA agencies.⁹

Building Maintenance/Repair. Installation maintenance tasks typically include routine and minor repairs, such as bathroom repairs, roof repairs, painting, equipment maintenance and upgrades, and electrical repairs. Building maintenance generally will have no adverse effect on historic properties if the Secretary of the Interior's *Standards for Rehabilitation*¹⁰ are followed. However, if neglect of an historic property leads to deterioration or destroys the historic features that qualify it for the National Register, such neglect is considered an adverse effect. Generally, maintenance and repair work that involves the interior of the building will have no effect on archeological resources. However, grounds maintenance or utility installation or replacement activities that involve disturbing or excavating soils around the perimeter of a building may affect archeological resources in the vicinity.

Rehabilitation/Major Repair. Rehabilitations and major repairs generally include repair, replacement of materials, and/or construction. Although rehabilitation and/or major repair projects will have an effect on historic buildings, the effect is not always adverse as long as the rehabilitation work is completed according to the Secretary of the Interior's *Standards for Rehabilitation*. If work does not follow these guidelines, it is likely that the SHPO will find the project to have an adverse effect during the Section 106 consultation process. Rehabilitation and repair projects that are confined to the building's interior generally will not impact archeological resources; however, rehabilitation projects that involve excavation or ground disturbing activities (i.e., enlarging the building footprint, excavating basements or installing drainage systems) may result in potential effects on adjacent archeological resources.

Current major repair and rehabilitation projects proposed for Fort Belvoir's housing include the replacement and/or extension of patios in the rear of residences and renovations to electrical and heating systems.^{11, 12}

Ground Disturbance. Ground disturbance (e.g., grading, digging, trenching or plowing) poses a risk of potential effects to archeological resources. Examples of ground disturbing activities include, but are not limited to, the maintenance and construction of water, gas, and sewer lines; fuel tank removal; parking lot construction; building demolition; and building foundation construction. Some forms of training activities, particularly those that involve explosives or demolition, also may impact archeological resources. Accidental or intended disturbance of a National Register eligible archeological site by such activities or by actions indirectly associated with these types of undertakings, constitutes an adverse effect.

Several road realignments that currently are being considered at Fort Belvoir, including the closure of Beulah and Woodlawn roads and re-routing Woodlawn Road as a straight northerly extension of the present Mill Road through the North Post/HEC area¹³ may impact previously identified National Register-eligible archeological sites within this largely undeveloped section of the installation. Fort Belvoir can take measures to reduce the impact by planning and budgeting for archeological evaluations (Phase II studies) of potentially Register-eligible sites in advance of such construction, and by recognizing that unexpected discoveries still could occur. *Procedure 8, Emergency Procedures for Unexpected Discoveries of Archeological Deposits* (Chapter IV) addresses the appropriate procedures to follow in the event of unanticipated discovery of archeological deposits.

Ground disturbance generally will have no adverse effect on architectural resources. However, if the project affects important historic landscapes or settings, ground disturbance may

have an adverse effect on the resource. Fort Belvoir project planners should determine the impact of ground disturbing projects on the surrounding area, including historic viewsheds and landscapes in their determinations of effect.

Training activities. When the Engineers' School relocated from Fort Belvoir to Fort Leonard Wood, Missouri, many training activities that formerly took place at the installation were suspended; use of the Engineer Proving Ground to test weaponry and explosives was discontinued. Nonetheless, a few minor training activities and facilities are extant or on-going within the installation. These consist primarily of instructional classes that take place in indoor classroom settings, and outdoor activities such as land navigation (orienteering) exercises, bivouac, and helicopter flying practice, all of which currently take place within four specific training areas (T-1, T-8, T-9, and T-16). The ceremonial "Old Guard" unit from Fort Myer stables its horses in Area T-8, and various reserve units practice bridge building and amphibious landings at their established practice facilities near Tompkins Basin. All training and ancillary activities except those associated with Reserve units are scheduled in advance through the Directorate of Personnel, Training, Management and Security (DPTMS).¹⁴

The general impact of the present program of training exercises on the current landscape and historic resources at Fort Belvoir is judged to be minimal. The current level of training exercises involves almost no ground disturbing activities; the current training areas are located well away from the National Register eligible or listed historic districts, buildings, and archeological sites; and an archival study of the most potentially intrusive area of activity, the Reserve unit amphibious landing site at Tompkins Basin, found that the potential for finding significant archeological resources within this area was low.¹⁵ Concurrence for that finding was obtained from VDHR in 1994.¹⁶

Conclusion

Fort Belvoir undertakes a broad range of projects in support of its mission, including training, maintenance, repair, and construction projects. Activities that have a high potential to affect cultural resources include ground disturbance in the vicinity of archeological resources that are potentially eligible, eligible, or listed in the National Register, or extensive repairs, rehabilitation, and/or new construction that may, directly or indirectly, impact other types of historic properties. In addition, certain areas that have a moderate to high potential for previously unrecorded archeological sites also may warrant closer scrutiny. Careful planning and early coordination within the Section 106 consultation process will streamline the review and consultation stages.

Some proposed projects, such as general building repair and maintenance, could be determined to have no effect, provided that:

- the work being performed does not affect an historic building, property, setting, or site (**no cultural resources are located in the area of potential effect**);
- the work being performed does not alter or change those characteristics that qualify the historic building or archeological site for the National Register (no effect); or

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- the work is being performed on part of a structure that has been intensively altered (such as a contemporary addition) or a previously disturbed portion of an archeological site, that is not important to its historic significance (**no effect**).

Because many such projects currently are defined as "undertakings" that affect historic properties, Section 106 requires review of each separate undertaking. This is a time-consuming and impractical procedure. Development of a Programmatic Agreement (PA) among the Department of the Army (Fort Belvoir), the SHPO, and the ACHP can help to reduce the necessity for reviewing standard and/or repetitive maintenance and repair projects undertaken at Fort Belvoir by establishing standardized procedures for maintenance and repair activities, and for ground-disturbing undertakings in previously disturbed areas. The next chapter, *Management Strategies*, discusses development of a PA in more detail, and a Draft PA has been submitted with this document.

Current Cultural Resource Management Program

Management Framework at Fort Belvoir

The following section examines the existing organizational framework at Fort Belvoir, and outlines the procedures by which planning and development occur at the installation. It illustrates how programs conducted by each division influence cultural resources management. Such actions may result from the implementation of long-term master planning initiatives; rehabilitation work proposed in annual planning meetings; and immediate repair needs and general maintenance. The duties of the Cultural Resource Manager (CRM) also are defined.

General Administrative Structure. As the major administrative and logistics center for the Northern Virginia portion of the Military District of Washington (MDW), Fort Belvoir is primarily a housing and administrative installation. The post currently hosts 109 tenant organizations, including various agencies of the Department of the Army (DA) and the DoD; private tenants; and state and local government agencies. Installation command and operations are vested in the Garrison Commander whose tour of duty lasts three years; the deputy post commander is a civilian position.^{17, 18}

Fort Belvoir's current administrative structure includes the following components: (1) Directorate of Installation Support (DIS); (2) Directorate of Resource Management (DRM); (3) Directorate of Information Management (DOIM); (4) Directorate of Plans, Training, Mobilization, and Security (DPTMS); (5) Directorate of Personnel and Community Activities (DPCA); (6) Directorate of Health Services; (7) Directorate of Dental Services; (8) Civilian Personnel Advisory Center (CPAC); (9) Public Affairs Office (PAO); (10) Staff Judge Advocate; (11) Inspector General; (12) Staff Chaplain; (13) Equal Employment Opportunity (EEO) Office; (14) Internal Review and Audit Compliance Office; and (15) Provost Marshall Office. Some base operations are performed by private contractors.¹⁹ Each division performs functions, maintains jurisdictions, or has needs for physical plants that may impact on the management of historic resources at Fort Belvoir.

Directorate of Installation Support (DIS). The Directorate of Installation Support (DIS) is directly responsible for managing cultural resources at Fort Belvoir; DIS also incorporates the administrative offices and responsibilities of the formerly separate Directorate of Logistics.²⁰ DIS is primarily responsible for:

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- managing and implementing all facility and infrastructure improvements to the installation, including buildings and other physical facilities, infrastructure, and natural resources;
 - advising the Installation Commander on all aspects of planning, engineering, housing, environment, and natural and cultural resources, and implementing command policies and decisions in these areas;
 - providing services to various tenant agencies located within the installation boundaries and to the Humphreys Engineer Center (HEC);^{21, 22, 23}
 - undertaking minor construction projects;
 - planning and programming major construction;
 - coordinating and supervising contractors involved in post maintenance and development;
 - through Army Family housing, managing the installation's housing assets. Army Family Housing, however, is funded and operates separately; and
 - managing the installation's environmental and natural resources programs through its Environmental and Natural Resources Division.^{24, 25}

Three principal divisions within DIS have responsibilities that directly affect cultural resources at Fort Belvoir. These include:

- *Engineering, Plans and Services (EP&S) Division.* EP&S has three branches that deal directly with design (overseeing Architecture and Engineering), utilities and grounds.²⁶
- *Contract Management Division.* The Contract Management Division has the facility planning branch and the work management branch.²⁷ The Master Planning function, major projects, real property issues, and the IFS all are housed under the Contract Management Division. The Master Planner provides overall planning expertise, and initiates and oversees requests for new construction and major rehabilitation. Facilities Planning plays an important role in cultural resources management by providing technical project support and overseeing facility planning (e.g., Real Property Master Plan). The Master Planning office tracks the progress of all of the projects, and issues a monthly report showing the status of all major projects. The Master Planner also schedules monthly project meetings that include Facilities Planning, EP&S, Design, Environmental, and Housing divisions within DIS.²⁸
- *Environmental and Natural Resources Division.* The Environmental and Natural Resources Division (ENRD), comprised of the Environmental and Natural Resource Branches,²⁹ is responsible for managing Fort Belvoir's environmental and natural resources programs. Currently, the Cultural Resources Manager (CRM) is located in this division, and is responsible for both cultural resources (Sections 106 and 110 of NHPA) and environmental

(NEPA) compliance.^{30, 31} The Installation Commander is responsible for ensuring that the CRM possesses the appropriate knowledge, skills, and professional training and education to carry out the responsibilities outlined in AR 200-4 (Section 1-9).

All alterations and repairs undertaken by DIS are generated either as a routine service order or an Individual Job Order. Each requires creating a data entry into the Installation's real property database, known as the Integrated Facilities System (IFS). All buildings that have been surveyed and found to be "potentially-eligible" or "eligible" for listing in the National Register of Historic Places or "contributing" to the Fort Belvoir Historic District have been keyed as "historic" in the database. This code indicates that anyone initiating work must coordinate the undertaking with the Cultural Resource Manager.

If a tenant organization wishes to initiate the alteration of any real property on the Installation, they must receive an authorization to do. Usually this takes the form of submitting a memorandum to the DIS facility planning staff that reviews the IFS record on the facility, and circulates the tenant's proposal among the differing program areas: Fire and Safety, Cultural Resources, etc.³²

Individual job orders (IJOs) for projects costing less than \$2,000, are processed through this division. IJOs consist primarily of small repair projects and are requested by filling out a Form 4283. Work orders that include large-scale projects (e.g., MILCON funded projects) require submittal of a Form 1391. IJOs and work order requests can be submitted by in-house personnel and/or by tenant organizations (i.e., FACOs). O&M is responsible for funneling the job requests through other offices, including Environmental and Natural Resources.³³ Once O&M prepares a cost estimate, it is filed on a form and a purchase order or delivery order is issued. The estimators are responsible for coordinating with the Environmental Division. For example, excavation permits processed through O&M require review and approval by the Environmental and Natural Resources Division (ENRD) of DIS.^{34, 35} The installation does not have an in-house maintenance staff. Instead, all maintenance on the post is privately contracted. Maintenance requests are sent directly to the contractor for implementation.³⁶

The potential impact of Facilities Planning activities on cultural resources is great, since this division is involved directly in the planning and designing of construction projects, coordinating external project reviews, overseeing contractors, and implementing projects. Inappropriate repairs, rehabilitation, or new construction can generate significant impacts on both historic buildings and archeological sites. Because projects administered by Facilities Planning generally require advanced planning, sufficient time is generally available to consider potential impacts to cultural resources.

Other functions of DIS. Fort Belvoir presently provides housing billets for members from all four service branches in the MDW region. Fort Belvoir manages and maintains roughly 2,700 properties, including the Woodbridge family housing area, which has been leased to Prince William County and is scheduled to close through Base Realignment and Closure (BRAC). The directorate also evaluates tenant requirements, develops housing plans, rents units, and assesses maintenance and construction requirements.^{37, 38, 39} Fort Belvoir's 13 residential neighborhoods are sited primarily along the eastern edge of the South Post. Much of the troop housing is located in the Lower North Post area. Woodlawn Village has housing set aside for Navy and Coast Guard personnel assigned in the National Capital Region (NCR). The rest of Woodlawn Village, along with the other housing areas, is available to Army personnel assigned in the NCR or personnel of any service assigned to Belvoir.⁴⁰

Housing programs can affect cultural resources through their influence on how housing units are maintained and used. The existing stock of family housing located within the Fort Belvoir Historic district is in itself historic; therefore, it is subject to restrictions regarding the types of materials, the nature of additions, etc. that are proposed for repair and improvement. Repair and improvement projects are the most common undertakings initiated by the Housing Division, and bathroom and kitchen renovations and window replacements are the most common types of housing requests. A project is initiated by submitting a work order to the Business Management Department and preparing a cost estimate. The request is sent to Contract Management. Contract Management is responsible for notifying ENRD if historic buildings are affected, so that the proposed project can be routed through the Section 106 process.^{41, 42} Routine maintenance of Fort Belvoir's housing is undertaken by a private contractor, who receives orders for maintenance directly.⁴³

Tenant Organizations. Fort Belvoir presently hosts 109 tenant organizations. Although most of these tenants are either Department of the Army (DA) or DoD agencies, other functions are represented, including private tenants (e.g., banks, commissaries) and local and state government agencies (e.g., Fairfax County Public Schools). Among Fort Belvoir's current tenants are: U.S. Army Information Systems Software Center (USAISSC); Communications Electronics Command (CECOM) Research, Development and Engineering Center (RDEC); U.S. Army Operational Support Airlift Command (USAOSAC); Defense Mapping School; U.S. Army Engineering and Housing Support Center (USAEHSC); U.S. Army Nuclear and Chemical Agency (USANCA); U.S. Army Reserve Center (USARC); U.S. National Guard; and Baltimore District, U.S. Army Corps of Engineers, Capital Area Office (CAO). Some tenant organizations are independent DoD agencies, such as the Defense Logistics Agency (DLA) and Defense CEETA. Tenant organizations at Fort Belvoir have installation support agreements (ISSAs) with the post, and each tenant also has a designated Facilities Communications officer (FACO) who maintains contacts with DIS.⁴⁴

Undertakings initiated by tenant organizations that may affect cultural resources include maintenance, repair, renovation or rehabilitation, demolition, new construction, and ground disturbing activities. AR 200-4 and Federal statutes and regulations stipulate that, although activities of tenant organizations may affect the cultural resources under the tenant's control, the ultimate responsibility for protecting and managing Fort Belvoir's cultural resources falls on the Garrison Commander or his designated CRM officer, **NOT** on the tenant organization. Therefore, tenant organizations must inform the CRM of any proposed actions or activities, so that the CRM can determine their potential effects on cultural resource(s) and initiate appropriate Section 106 compliance actions, where necessary.

Humphreys Engineer Center (HEC). The Humphreys Engineer Center (HEC) is an independent 583-acre installation adjacent to Fort Belvoir. Although a separate entity with its own master plan, the two installations do collaborate as a result of an inter-installation agreement. As part of this agreement, Fort Belvoir provides environmental and cultural resources support services for HEC. Specifically, this agreement states that the ". . . [S]upplier will provide services of Environmental and Natural Resources Division on the same basis as for installation activities and in accordance with attached Memorandum of Agreement concerning hazardous waste generation." The "supplier" in this case is DIS at Fort Belvoir. For example, HEC can request the services of Fort Belvoir to remove obsolete fuel tanks from their property. HEC and Fort Belvoir also can be involved in joint archeological projects; this is the case when new projects planned by Fort Belvoir affect HEC properties. Alternatively, if HEC initiates a project, they may choose to contract with the Baltimore District Corps of Engineers or a private contractor to complete cultural resources

surveys.⁴⁵ Cultural resource studies conducted within HEC are included in the summary tables listing previous research at Fort Belvoir.

Site selection for new facilities at HEC also is discussed and coordinated with the Planning Branch of DIS. Fort Belvoir's RPMP real property list includes HEC properties and identifies them as "non-reportable property."⁴⁶

Policies and Procedures

The following section examines procedures and policies presently used at Fort Belvoir to implement planning and installation development, and reviews the ways in which these processes currently affect cultural resource planning. These include:

- The DIS Forum. This weekly staff meeting of DIS division chiefs is utilized to main intra-office communication within the directorate. The meetings provide opportunities to discuss common issues, and ensure coordination of efforts among division chiefs. The DIS Forum does not function as a policy-making body. Suggested new policies within the Directorate must be submitted to and approved by the Garrison Commander through staff papers; such policies remain in force for one year, but may be re-authorized by the Garrison Commander.^{47, 48}
- Facilities Area Coordinator (FACO). Each tenant organization has a designated Facilities Area Coordinating Officer (FACO). FACOs are informed by the Fort Belvoir OPS of developments and decisions made at the installation level. The FACOs also meet periodically to be briefed on installation developments and to discuss their own current activities.⁴⁹
- Installation Planning Board. Fort Belvoir's Real Property Planning Board meets twice yearly to review objectives and goals; review the Real Property Master Plan; and discuss current and proposed projects. The board is composed of the Garrison Commander and Deputy Commander; the chiefs of all major directorates; the installation Master Planner; and representatives of larger tenant organizations. The Planning Board serves as a sounding board and basically approves projects.⁵⁰

When DIS submits plans for a proposed project, they are reviewed by the Garrison Commander and Planning Board, who reserve the right of final approval. The Garrison Commander must sign a "Form 1391" prior to submitting the project to Congress for appropriations.⁵¹ Form 1391 is discussed below, under the section *Military Construction (MILCON)*.

Real Property Master Plan (RPMP). Fort Belvoir's Real Property Master Plan (RPMP)⁵² details Fort Belvoir's development objectives and long-range planning issues and goals. Implementation of the master plan ensures the orderly management and development of the installation's real property assets, including its land, facilities, resources, and infrastructure⁵³ by:

- establishing the future direction for development or downsizing of the installation;

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- managing limited resources within the framework of the overall plan;
 - relating installation development to local community development;
 - flagging decisions that may have controversial environmental impacts or violate the law;
 - linking programming to RPMP decisions;
 - comparing existing facilities to projected facility needs and other developmental and operational activities, in support of the five-year construction program;
 - supporting the Army Communities of Excellence program; and
 - identifying the acceptability of proposed land use and facility changes.

Issues addressed in Fort Belvoir's RPMP include environmental quality review; natural and cultural resources assessment; land use assessment; environmental assessment; general utilities review; traffic circulation and transportation; and installation design guide. Compliance requirements with the NHPA and Army Regulation 200-4 are addressed in Chapter 5, Section E, which also provides a summary of known archeological resources and existing architectural/historic properties.⁵⁴ Specific long-range planning issues are presented in Chapter 3 of the master plan, and are categorized by component (i.e., environmental, land use, utilities/infrastructure, transportation and traffic, and physical appearance).

The Fort Belvoir ICRMP should be integrated with the master planning and other planning documents to ensure that recommendations affecting historic resources will undergo appropriate reviews, in compliance with applicable federal legislation and Army regulations. The RPMP is scheduled for revision in 2003. Most projects that were identified in the current master plan are considered "undertakings" as defined in Section 106 of NHPA; for those that may affect historic properties, consultation with the Virginia SHPO office is required. Early identification and assessment of a proposed project by the Master Planner will ensure that appropriate preservation measures can be applied within specific project budgets and time constraints.

Project Funding. Funds for undertakings on the post are derived from a variety of sources, depending on the agency that has initiated the project and on the amount of funding requested. An understanding of project funding is essential for adequate cultural resources planning and development, because the NHPA provides that anticipated cultural resource management costs can be included in project development budgets.

- Military District of Washington (MDW). MDW can issue some independent construction contracts for installation work up to \$100,000, excluding Environmental Assessments (EAs).⁵⁵

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- Military Construction (MILCON). Military Construction (MILCON) projects include new construction and major renovations requiring new work in excess of \$500,00. These types of projects are included as line items in

the budget and are requested individually from the U.S. Congress. "L" funds are designated for new work; "K" funds are for maintenance and/or repair.⁵⁷ The MILCON submittal process is discussed in greater detail in the following section on *Project Tracking*.

Project Tracking. This section addresses operational procedures such as requests for MILCON funding, work orders/service orders, and compliance activity at Fort Belvoir.

MILCON Projects. Requests for MILCON funding are initiated on the installation level by submitting the request to the Facilities Planning Division/Master Planning, who reviews it, selects potential sites (if new construction), and initiates programming for the facility. A request can be submitted either by existing tenants, or by new tenant organizations that seek to locate their facilities at Fort Belvoir. Planning and execution of MILCON projects entails the following procedure, which allows opportunities for input on cultural resource concerns at a variety of stages:

- Project initiation. A programming document known as "DD Form 1391" is completed for both new construction and major renovations (Figure 11). DD Form 1391 includes, among other items, an initial cost estimate, project description and justification, as well as general information on proposed project location and environmental documentation.

Section 15 of DD Form 1391, which addresses environmental issues, is submitted to the ENRD, which determines whether the proposed project already has been subjected to environmental analysis through an EA or EIS, or whether the project is exempt as a categorical exclusion. Historic preservation issues are dealt with in Section 18 of the form, which contains space for concurrence from the SHPO or findings from previous cultural resources investigations.⁵⁸

If warranted, ENRD conducts necessary compliance work and completes required consultation processes at the early stages of the programming process. In his review, the Chief of ENRD, who must sign off on DD Form 1391, is responsible for preparing EAs and fulfilling other permitting requirements (e.g., wetlands permits, Section 106 review), and signing the form.⁵⁹

- Project Review. The completed DD Form 1391 next is reviewed and approved by several agencies, including: (1) the Garrison Commander; (2) the Military District of Washington (MDW); (3) the Department of the Army (DA); and (4) the District, Division, and Headquarters levels of the Corps of Engineers. Any of these agencies can make changes to the project and/or its place in a priority list; for example, a project that Fort Belvoir ranked as priority one can become a priority 10 project in a list of projects funded by MDW. Once the project is reviewed by these various agencies, the front page of the programming document is submitted to Congress for funding.^{60, 61}

Early consideration of cultural resources issues can permit changes in proposed site location and/or initiation of a Section 106 compliance action with relatively little delay of the project itself. If the project involves

Section 1 - Project Information: Funding Type, Year of Construction, Type of Project, Category Code, Project Title, Duration of Construction

Section 2 - Primary Facility and Supporting Facility Costs, Contingency Cost, and Supervision, Inspection & Overhead Costs.

Section 3 -

3A: Scope of Work

3B: Total Requirement, Total Adequate & Total Substandard

3C: Project: One line description of the project

3D: Requirement

3E: Current Situation

3F: Impact If Not Provided

3G: Additional Information: Physical Security Statement, References to Regulations, and any special features.

Section 4 -

Prior Funding, Signature Block

Section 6 - Quantitative Data

Section 7 - General Information: General Location, Installation Mission, Impact of Command and Changes, Site Description, Unit Mission, Project Objectives, Parking Requirements, and Traffic Analysis.

Section 8 - Present Accommodations & Dispositions

Section 9 - Real Property Maintenance

Section 10 - Analysis of Deficiencies

Section 11 - Economic Analysis Data

Section 12 - Criteria for Proposed Construction

Section 13 - Furnishings and Equipment

Section 14 - Not Applicable

Section 15 - Environmental Analysis (Documentation)

Section 16 - Evaluation of Flood Hazard and Encroachment on Wetlands

Section 17 - Information Systems Cost Estimate

Section 18 - Protection of Historic Properties

Section 19 - Energy and Utility Requirements

Section 20 - Provisions for The Handicapped

Section 21 - Commercial Activities

Section 22 - Physical Security Data

proposed renovations to historic properties, a cost estimate and feasibility study is conducted. The SHPO is allowed time to review proposed rehabilitations to historic properties during the planning stages. The National Capitol Planning Commission (NCPC), which serves as the principal planning agency for the Federal government in the National Capital Region (NCR), also may provide comments and recommendations on both new construction and rehabilitation projects, and ensure that required compliance hurdles (e.g., environmental and natural/cultural resources) have been addressed.^{62, 63, 64}

- *Project Design/Approval.* A pre-design meeting is scheduled among the Baltimore District Corps of Engineers and representatives from Facilities Planning; Environmental Division; Safety; and other installation agencies. The Corps of Engineers typically manages the design work (e.g., plans and drawings); oversees construction; and has statutory authority over wetlands, navigation permits, and all real estate. Site selection also is reviewed through Fort Belvoir's Facility Planning Branch; ENRD works with the Planning Division to decide on a site for a proposed project.^{65, 66}

Additional meetings are scheduled at the 10 per cent (preconcept designs), 30 per cent (site details, elevations of proposed facility), and 90 per cent (final design and landscaping) design stages. At each stage, the project is reviewed by the Post staff, organization, Environmental Division, and appropriate subdivisions

- *Project implementation.* After the project is let for bid and a contractor is selected, a pre-construction meeting is scheduled with the building contractor, post personnel, and COE representatives to discuss the requirements of the construction contract.⁶⁷ The DIS Master Planner tracks the progress of all projects; issues a monthly report showing the progress and status of all MILCON projects; and meets monthly with other DIS divisions, including Facility Planning; Engineering Plans and Services; Design; ENRD; and Housing, to inform them of project status.⁶⁸

ENRD monitors the site throughout construction to ensure that work is completed in compliance and according to project specifications.⁶⁹

Work Orders/Service Orders. Repair and construction work performed at Fort Belvoir originates as a work or service order request submitted to the DIS director by in-house personnel or a tenant organization.

- The work/service order contains supporting documentation to justify the request and typically requires the approval of the Garrison Commander. A sketch of the proposed work also can be provided.
- The project receives an individual job number (IJO), and is assigned to a housing (FH) or non-housing (FE) category.⁷⁰

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- Level 1 service orders (e.g., maintenance jobs or those involving new work valued at less than \$200 worth of material or 8 hours of work) are sent directly to the post's privately contracted facility maintenance group.
 - Work orders entailing service or repairs costing between \$1,000 and \$1 million dollars are:
 1. entered into the installation's Integrated Facility System (IFS), which tracks the status of individual projects. The IFS system has been modified to automatically tag requests dealing with repairs to historic buildings.
 2. routed through ENRD-Cultural Resources for review if the IFS system shows involvement of historic properties;
 3. routed to a planner/estimator in DIS (operations and maintenance) who prepares a form cost estimate;
 4. issued a purchase order or delivery order against a specific IDQ contract that has been negotiated with a variety of contractors. Archeological excavation permits also go through operations and maintenance and require an environmental checkoff-signoff.⁷¹

Conclusion

Under its present system and program of cultural resource management, Fort Belvoir has undertaken numerous successful projects to comply with Sections 106 and 110 of NHPA. The installation has completed an identification survey for archeological resources,⁷² and has evaluated 43 archeological sites on the installation, of which 11 have been determined National Register eligible.⁷³ The installation also has made significant strides in identifying, evaluating, and maintaining its historic built resources, which include one National Register eligible historic district, one multiple property, and two individual structures.

However, improvements to facilitate the smooth and consistent operation of this system could be made. Management goals for such improvements are contained in Chapter V, *Action Plan*.

Planned Undertakings at Fort Belvoir: 1999-2004

Table 8 presents a summary of on-going and planned MILCON projects through the year 2004.

- Six projects involve renovation of existing built resources. Renovation/rehabilitation projects scheduled for National Register-eligible built resources will require Section 106 action; rehabilitation actions involving sub-surface disturbance also may require archeological investigations if their Area of Potential Effect (APE) includes either sites that

have not been evaluated for National register eligibility or sites that have been determined to be National Register eligible.

- Eight new construction projects are included in the list of planned undertakings. Their impact is expected to be primarily archeological, although analysis of secondary effects on viewsheds and nearby National Register-listed or Register-eligible built resources may be required.
- Demolition of family housing buildings is involved in one project. By definition, building demolition constitutes an adverse effect on an historic property. Formal evaluation of the National Register eligibility of the buildings or complexes to be demolished and mitigation of adverse impacts may be required.

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